

KIRKLAND & ELLIS LLP
AND AFFILIATED PARTNERSHIPS

Wendy L. Bloom
To Call Writer Directly:
+1 312 862 2343
wendy.bloom@kirkland.com

300 North LaSalle
Chicago, IL 60654
United States

+1 312 862 2000

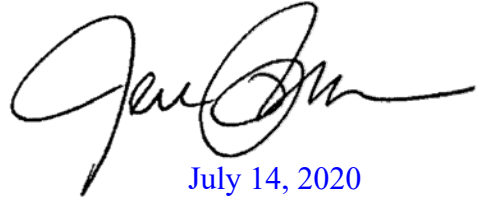
www.kirkland.com

Facsimile:
+1 312 862 2200

July 13, 2020

The Clerk of Court is directed to terminate 19-CV-11922, ECF No. 28 and 14-MD-2543, ECF No. 7981. The conference scheduled for tomorrow is canceled. SO ORDERED.

The Honorable Jesse M. Furman
United States District Court for the
Southern District of New York
500 Pearl Street
New York, NY 10007



July 14, 2020

Re: *In re GM LLC Ignition Switch Litig.*, 14-MD-2543 (JMF)
***Dukes v. GM LLC*, 19-CV-11922**

Dear Judge Furman:

On June 29, 2020, the Court scheduled a telephonic conference for July 1, 2020 regarding New GM's pending motion to dismiss with prejudice plaintiff Jennifer Dukes for overdue discovery under Order No. 25. (Docket No. 8016.) On June 30, 2020, counsel for New GM and counsel for Ms. Dukes conferred, and plaintiff's counsel requested a 10-day stay to produce the outstanding materials. New GM agreed, and the parties requested an extension from the Court. On July 1, 2020, the Court rescheduled the telephonic conference for July 15, 2020, and instructed the parties to file a joint letter by July 13, 2020 updating the Court on the status of their efforts and indicating whether a conference is necessary. (Docket No. 8024.)

On July 13, 2020, plaintiff's counsel provided New GM a declaration of Ms. Dukes stating that she does not have in her possession any of the documents that New GM previously identified as missing from her prior production of documents. The declaration is attached hereto as Exhibit 1. Therefore, the parties respectfully submit that a telephonic conference on this matter is not necessary, and New GM withdraws its motion to dismiss Ms. Dukes with prejudice (Docket No. 7981). The parties further request that Ms. Dukes' case be reinstated as an active matter on the MDL 2543 docket.

Respectfully submitted,

/s/ Wendy L. Bloom
/s/ Andrew B. Bloomer, P.C.

Counsel for Defendant General Motors LLC

cc: MDL Counsel of Record

Exhibit 1

DECLARATION OF JENNIFER DUKES

I, JENNIFER DUKES, do state and declare as follows:

1. I am over the age of eighteen years and a resident of Maryland. I am a Plaintiff in the subject matter action. I have personal knowledge of the following.

2. I do not have any documents re: purchase of the subject vehicle. The vehicle was purchased by my mother several years ago, and the documents could not be found.

3. I do not have any documents related to insurance, including claims submitted and policies in effect as of the date of the subject incident that covered or might have covered me, the subject vehicle, or the property on which the subject incident occurred. There was a GEICO policy in effect at the time, which was noted on the police report, which was provided to GM.

4. I do not have any data downloaded from the subject vehicle's SDM.

5. I do not have any photographs of any injuries sustained in the subject incident. I have provided medical reports and billings to GM.

6. I do not have any electronic data or electronic surveys taken and/or related to the subject incident scene.

7. I do not have any written or recorded statements from myself related to the subject incident, the subject vehicle, or my claimed injuries.

8. I do not have any documents or photographs of media coverage of the subject incident.

I declare, under penalty of perjury under the laws of the United States, that the foregoing is true and correct. SIGNED on July 13, 2020 at Glenburnie, MD.

/s/ JENNIFER DUKES